

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION**

In re:	)	
	)	
CAH ACQUISITION COMPANY #1, LLC,	)	Case No. 19-00730-5-JNC
d/b/a WASHINGTON COUNTY HOSPITAL,	)	Chapter 11
	)	
Debtor.	)	
	)	
In re:	)	
	)	
CAH ACQUISITION COMPANY #2, LLC,	)	Case No. 19-01230-5-JNC
d/b/a OSWEGO COMMUNITY HOSPITAL,	)	Chapter 11
	)	
Debtor.	)	
	)	
In re:	)	
	)	
CAH ACQUISITION COMPANY #3, LLC,	)	Case No. 19-01180-5-JNC
d/b/a HORTON COMMUNITY HOSPITAL,	)	Chapter 11
	)	
Debtor.	)	
	)	
In re:	)	
	)	
CAH ACQUISITION COMPANY 6, LLC,	)	Case No. 19-01300-5-JNC
d/b/a I-70 COMMUNITY HOSPITAL,	)	Chapter 7
	)	
Debtor.	)	
	)	
In re:	)	
	)	
CAH ACQUISITION COMPANY 7, LLC,	)	Case No. 19-01298-5-JNC
d/b/a PRAGUE COMMUNITY HOSPITAL,	)	Chapter 11
	)	
Debtor.	)	
	)	
In re:	)	
	)	
CAH ACQUISITION COMPANY 12, LLC,	)	Case No. 19-01697-5-JNC
d/b/a FAIRFAX COMMUNITY HOSPITAL,	)	Chapter 11
	)	
Debtor.	)	
	)	
In re:	)	
	)	
CAH ACQUISITION COMPANY 16, LLC,	)	Case No. 19-01227-5-JNC
d/b/a HASKELL COUNTY COMMUNITY	)	Chapter 11
HOSPITAL,	)	
	)	
Debtor.	)	

**NOTICE OF MOTION FOR ORDER AUTHORIZING AND APPROVING (I) LITIGATION FUNDING AGREEMENT WITH OMNI BRIDGEWAY (FUND 4) INVT. 3 L.P.; (II) ENGAGEMENT AGREEMENT WITH MCDONALD HOPKINS LLP RELATED TO LITIGATION FUNDING; AND (III) ENGAGEMENT AGREEMENTS WITH WALDREP WALL BABCOCK & BAILEY PLLC AND MCDONALD HOPKINS LLP RELATED TO LITIGATION EFFECTIVE FROM AND AFTER APRIL 15, 2023**

**NOTICE IS HEREBY GIVEN** of the Motion for Order Authorizing and Approving (I) Litigation Funding Agreement with Omni Bridgeway (Fund 4) Invt. 3 L.P.; (II) Engagement Agreement with McDonald Hopkins LLP Related to Litigation Funding; and (III) Engagement Agreements with Waldrep Wall Babcock and Bailey PLLC and McDonald Hopkins LLP Related to Litigation Effective from and after April 15, 2023 filed by Thomas W. Waldrep, Jr. (the “Trustee” or “Litigation Trustee”) on May 23, 2023 (“Motion”) seeking approval (i) of the Litigation Funding Agreement (as defined in the Funding Motion) which provides litigation funding to the Trustee in connection with pending and future claims and adversary proceedings which are beneficial to the bankruptcy estates; (ii) of the Litigation Funding Engagement Agreement which approves fees and expenses of McDonald Hopkins LLP in connection with the procurement of the Litigation Funding Agreement; and (iii) the April 15, 2023 Litigation Engagement Agreements between the Trustee and McDonald Hopkins LLP and Waldrep Wall Babcock & Bailey PLLC relating to litigation fees and expenses.

**FURTHER NOTICE IS HEREBY GIVEN** that any objection to the Motion and request for hearing must be filed with the Clerk, United States Bankruptcy Court, P.O. Box 791, Raleigh NC 27602, with a copy served on the Trustee whose name appears at the bottom of this Notice on or before **twenty one (21) days from the date of this Notice**, and if no request for a hearing is timely filed, the Court may rule on the Motion and response thereto ex parte without further notice; and

**FURTHER NOTICE IS HEREBY GIVEN** that a hearing will be conducted on the motion on **June 20, 2023 at 11:00 a.m.** at the United States Bankruptcy Court, Randy D. Doub Courthouse, 150 Reade Circle, Greenville, North Carolina.

DATE OF NOTICE: May 23, 2023.

**WALDREP WALL BABCOCK  
& BAILEY PLLC**

*/s/ Thomas W. Waldrep, Jr.*

Thomas W. Waldrep, Jr. (NC Bar No. 11135)

Kevin L. Sink (NC Bar No. 21041)

Jennifer B. Lyday (NC Bar No. 39871)

370 Knollwood Street, Suite 600

Winston-Salem, North Carolina 27103

Telephone: 336.722.6300

Facsimile: 336.722.1993

Email: [notice@waldrepwall.com](mailto:notice@waldrepwall.com)

*Attorneys for the Trustee*